

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PATRICIA A. SCHULTZE, et ux.
JOSEPH SCHULTZE,

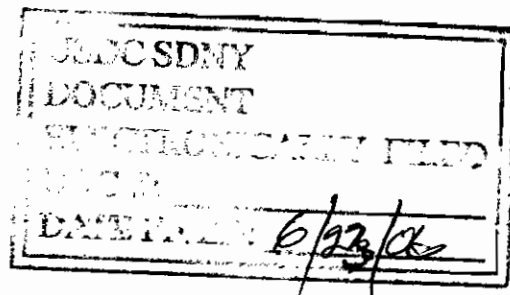
Plaintiffs,

06-CV-1883

-against-

DAIMLERCHRYSLER CORPORATION
and FAHEY IMPORTS, INC.,

Defendants.



STIPULATED PROTECTIVE ORDER

It is hereby stipulated and agreed, by and between the parties, that the production by Defendant DaimlerChrysler Corporation of certain documents and information that contain trade secrets or other commercially sensitive or proprietary information will be governed by the following terms, restrictions and conditions.

DOCUMENTS

This order shall apply to those documents DaimlerChrysler Corporation has agreed to produce subject to a protective order in its written responses to discovery requests, those documents which the Court orders to be produced subject to a protective order, and to those documents as to which the parties may subsequently agree this protective order applies. DaimlerChrysler Corporation will mark those documents "subject to protective order" or a similar designation to identify the documents to which this order applies.

1. Information contained therein shall be disclosed only to counsel of record in this action or only to individuals certified by such counsel as employed by or assisting counsel in preparation for, or at the trial of, this action.

2. Any such documents and/or information shall be used only for the purpose of prosecuting this action.


3. Any person or firm to whom such documents and/or information contained therein is to be disclosed shall first be advised by counsel making that disclosure that, pursuant to this Protective Order, such person or firm may not divulge any such information to any other person.

4. In the event that any document or the information contained therein is included with, or the contents thereof are in any way disclosed, in any discovery proceeding or discovery motion, filed with the Clerk of any Court, Plaintiffs shall file such protected documents and/or information under seal and shall be kept under seal by the Clerk until further order of this Court. Any use of any such document or of information contained therein and any testimony associated with the protected information contained therein shall be held *in camera* if necessary to prevent disclosure to non-parties, or otherwise under such circumstances as will prevent the inadvertent disclosure of such documents and/or information, unless the Court orders otherwise upon good cause shown.

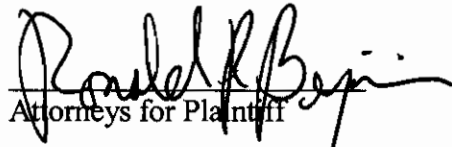
5. The production of any documents or other physical objects by DaimlerChrysler Corporation shall not constitute a waiver of the attorney-client or work product privilege, if the producing party: (1) notifies the receiving party that such documents or things were inadvertently produced and are subject to attorney-client or work product privilege; and (2) requests that the receiving party return any such documents or things. The receiving party shall also immediately notify DaimlerChrysler Corporation if they receive materials which, on their face, appear subject to privilege. Nothing in this paragraph circumvents applicable case law pertaining to attorney-client privilege or work product doctrine.

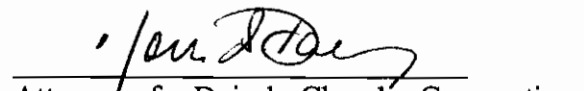
6. Upon the termination of this action, all copies furnished by DaimlerChrysler Corporation to Plaintiffs or any other party to this action, together with all originals and copies of

notes, sketches, data, compilations, extracts and reproductions furnished by DaimlerChrysler Corporation, shall be returned to counsel for DaimlerChrysler Corporation, together with a letter from Plaintiffs' counsel, or any other party to this action, that all documents, copies of such documents which were provided by DaimlerChrysler Corporation have been returned to DaimlerChrysler Corporation.


District Court Judge 6/24/06

DATED: This 24 day of 24 APRIL, 2006.


Attorneys for Plaintiff


Attorneys for DaimlerChrysler Corporation
(HR 9760)